

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: Dana Valley</b>	)	<b>Chapter 13</b>
<b>Lorie Valley</b>	)	<b>Case No. 1:18-bk-00968-HWV</b>
<b>Debtors</b>	)	
	)	
<b>New Cumberland Federal Credit Union</b>	)	
<b>Movant</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>Dana Valley and Lorie Valley,</b>	)	
<b>Respondents</b>	)	
<b>Charles DeHart, III, Trustee</b>	)	

**DEBTORS' RESPONSE TO MOTION OF NEW CUMBERLAND FEDERAL CREDIT  
UNION MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C.  
362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, New Cumberland Federal Credit Union filed its Motion for Relief from Stay on December 11, 2018.

2. Debtors Attorney received a request from Creditor's Attorney for proof of auto insurance policy on October 22, 2018 and then again on November 9, 2018.

3. Debtors Attorney provided the Certificate of Auto Insurance via email to the Creditor's Attorney on November 9, 2018.

4. Debtors requests the Court deny Movant's Motion for Relief.

WHEREFORE, Debtors, Dana and Lorie Valley, pray the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed on December 11, 2018 by New Cumberland Federal Credit Union.

Dated: December 19, 2018

Respectfully Submitted,

/s/Stephen Wade Parker  
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